



Department of Toxic Substances Control



Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

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N00236.000761
ALAMEDA POINT
SSIC. NO. 5090.3

Gray Davis
Governor

June 18, 2003

Mr. Luciano A. Ocampo, PE
Remedial Project Manager
Department of the Navy
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
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**NOTICE OF DEFICIENCY, AMENDMENT TO THE CLOSURE PLAN FOR THE
INDUSTRIAL WASTE TREATMENT PLANT (IWTP) 25 , NAVAL AIR
STATION ALAMEDA, CALIFORNIA, NOW KNOWN AS ALAMEDA POINT,
EPA ID # CA 2 170 023 236**

Dear Mr. Ocampo:

The Department of Toxic Substances Control (DTSC) received the Closure Plan Amendment for the Industrial Waste Treatment Plant (IWTP) 25 dated May 15, 2003. The DTSC permitting and Geological Services Unit (GSU) staff persons have reviewed the document and have the following comments:

1. It is recommended that both the Closure Plan Amendment (CP Amendment) and the Field Work Plan (FWP) be in one document. This will facilitate DTSC's review by ensuring that all items associated with the closure are included in one document. The FWP may be included as an appendix to the CP Amendment and should be referenced where appropriate in the text of the revised CP Amendment.
2. Some of the sections in the May 2003 CP Amendment refer to the Sampling and Analysis Plan (SAP) which was missing from the CP Amendment. The SAP shall be included either in the revised CP Amendment or the FWP.
3. The Executive Summary and Introduction states "approval of clean closure". It is unclear if the clean closure refers to unrestricted

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residential use or industrial use with a deed restriction. The revised CP Amendment should include a section clearly stating the closure performance standards

4. Section 1.0 of the revised CP Amendment should include all relevant facility identification information such as the facility name, Environmental Protection Agency (EPA) Identification (ID) number, address, contact person, etc. as described in Section 3.1 of the Department of Toxic Substances Control (DTSC) Permit Writer Instructions for Closure of Treatment and Storage Facilities (1994).
5. The revised CP Amendment should include a section which describes the size of IWTP 25 and the Navy should clearly identify the permitted unit presented on Figure 3. The RCRA permitted unit would include any aboveground or underground conveyance systems used to transport waste to IWTP25. The trench system referenced in Section 3.1, Facility Background from Building 25 should be considered part of the permitted unit. The permitted components described on Table 1 should be clearly identified on Figure 3.
6. Page 6, Section 3.1, Facility Background – The second paragraph of this section describes a trench system that conveyed waste from Bldg. 25 to IWTP 25. Please indicate if this system is the same as that described in Section 6.0. If it is a separate system, please note that it will be subject to closure requirements and sampling locations should be proposed. Please include a schematic of this trench system on Figure 3 in the revised CP Amendment.
7. Page 7, Section 3.2, Summary of Subsurface Investigation Results - Operations at IWTP 25 continued until 1999. Thus, soil and/or groundwater samples obtained prior to 1999 reporting concentrations less than laboratory detection limits should not be considered in the closure evaluation. Attachment C presents data from 1999, 1995 and 1994. The 1994 and 1995 data should be evaluated accordingly.
8. Page 8, Section 4.0, Decontamination Procedures for Equipment, Structures, and Buildings – This section should include estimates of the quantities of materials, waste, contaminated soils, etc. that may be generated and shipped offsite for disposal.
9. Page 10, Section 5.0, Confirmation Sampling Plan for Containment Structures, Tanks, And Equipment - Confirmation Sampling Plan for Containment Structures, Tanks and Equipment. The analysis of Volatile Organic Compounds (VOCs) in the concrete chip samples is not necessary.

10. Page 11, Section 6.0, Soil Sampling Plan

- A. This section indicates that two soil matrix samples will be collected along the piping from Bldg. 25 to IWTP 25. It should be noted that based upon the length of piping, number of joints, direction changes, etc., two samples may not be adequate to determine if a release has occurred. DTSC generally requires samples to be collected at all connecting joints for any underground pipes and/or 25 foot intervals. Sample analysis should include VOCs, total metals, and hexavalent chromium.
- B. It is not clear if this pipe will be removed. If the pipe is being removed as part of the decontamination procedures, then soil confirmation samples shall be obtained after removal. Groundwater samples should be collected in conjunction with the soil samples and analyzed for VOCs, total metals, and hexavalent chromium.

11. Page 12, Section 7.0, Analytical Test Methods - A table should be generated and included in the revised CP Amendment that shows the hazardous waste constituents and their EPA hazardous waste number/California waste code. This will ensure that the analytical test methods chosen are appropriate. Please note that analysis for Chromium VI should be done using Method 7199.

12. Page 15, Section 10.0, Soil Removal/Cleanup Procedures – The existing text under this heading is on tank removal, not soil removal. Closure performance standards or soil cleanup levels should be described when soil removal is planned. Please be advised that if clean closure cannot be achieved, a post-closure permit is then required.

13. Page 17, Section 12.0, Closure Certification Report Requirements – Please ensure that the revised CP Amendment includes the certification language as follows: "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Base on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Mr. Luciano A. Ocampo

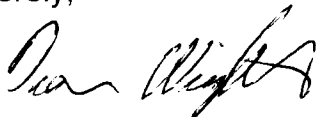
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14. Attachment E – DTSC is not familiar with the locations, depths, and soil properties associated with the Alameda background concentrations provided in this attachment. Please include this information in the revised CP Amendment and provide a rationale for using the background samples chosen to represent the IWTP 25 area.

Please address these comments in an IWTP 25 Revised Closure Plan Amendment and submit the document by July 9, 2003. If you have any questions or comments concerning this letter please contact Mr. Dean Wright at (916) 255-6528.

Sincerely,



for:
Wei Wei Chui, Section Chief
Standardized Permits and Corrective Action Branch

Enclosure

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